

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Terrance Johnson, Bret Yahraus, and Jacy
Purkiss, individually and as the representatives
of a class of similarly situated persons, and on
behalf of the Carpenters of Western Washington
Individual Account Pension Plan and the
Carpenters Retirement Plan of Western
Washington,

Plaintiffs,

v.

Carpenters of Western Washington Board of
Trustees, Callan LLC, Gerald Auvil, Noe
Castillo, Ken Ervin, Jeff Foushee, Kurt
Hildebrand, Steve Hoffmann, Martin Holberg,
Dan Hutchins, Ryan Hyke, Andrew Ledbetter,
Ron Montoya, Jim Osborne, Tim O'Neill,
Doug Peterson, Rick Poitras, Danny Robins,
Evelyn Shapiro, Bob Susee, Jeff Thorson,
Doug Tweedy, and Wilf Wainhouse,

Defendants.

No. 2:22-cv-01079-JHC

**STIPULATED MOTION AND ORDER
TO EXTEND CASE SCHEDULE**

1 Plaintiffs Terrance Johnson, Brent Yahraus, and Jacy Purkiss and Defendants Carpenters
 2 of Western Washington Board of Trustees, Gerald Auvil, Noe Castillo, Ken Ervin, Jeff Foushee,
 3 Kurt Hildebrand, Steve Hoffmann, Martin Holberg, Dan Hutchins, Ryan Hyke, Andrew Ledbetter,
 4 Ron Montoya, Jimmy Osborne, Tim O'Neill, Doug Peterson, Rick Poitras, Danny Robins, Evelyn
 5 Shapiro-O'Connor, Bob Susee, Jeff Thorson, Doug Tweedy, Wilf Wainhouse, and Callan LLC
 6 (collectively, the "Parties"), hereby stipulate as follows:

7 1. On January 10, 2025, the Court entered its Scheduling Order Regarding Class
 8 Certification Motion, Dkt. 146, setting forth the following deadlines:

9 Deadline to complete discovery on class certification	August 22, 2025
10 Deadline for Plaintiffs to file motion for class certification (noted on the 11 fourth Friday after filing and service of the motion pursuant to Local 12 Rules W.D. Wash. LCR 7(d)(3) unless the parties agree to different times for filing the response and reply memoranda)	September 19, 2025

13 2. On January 22, 2025, the Court issued an order setting additional case deadlines for
 14 Defendants' responsive pleadings (February 14, 2025), Rule 26(a)(1) initial disclosures (February
 15 28, 2025), and amending the complaint and/or adding parties (May 16, 2025). Dkt. 148. The Parties
 16 have complied with these deadlines.

17 3. The Parties have scheduled mediation for September 29, 2025.

18 4. The Parties are currently negotiating the scope of certain document requests, in an
 19 effort to make sure all Parties have the information necessary for a meaningful mediation without
 20 expending significant and potentially unnecessary resources.

21 5. Subject to the Court's approval, the Parties have agreed to move the deadlines to
 22 complete class certification discovery and class certification briefing until after mediation, to avoid
 23 potentially unnecessary expense prior to discussing potential resolution.

24 6. Accordingly, the Parties respectfully request the Court make the following
 25 amendment to the deadlines in the Court's January 10, 2025 Scheduling Order Regarding Class
 26 Certification Motion (Dkt. 146):

Event	Current Date	Proposed Date
Deadline to complete discovery on class certification	Aug. 22, 2025	Dec. 15, 2025
Deadline for Plaintiffs to file motion for class certification (noted on the fourth Friday after filing and service of the motion pursuant to Local Rules W.D. Wash. LCR 7(d)(3) unless the parties agree to different times for filing the response and reply memoranda)	Sept. 19, 2025	Jan. 12, 2026

Respectfully submitted this 29th day of July 2025.

ENGSTROM LEE LLC

/s/ Mark E. Thomson

Mark E. Thomson, MN Bar No. 0398260*
 Carl F. Engstrom, MN Bar No. 0396298*
 323 N. Washington Ave., Suite 200
 Minneapolis, MN 55401
 Telephone: (612)305-8349
 mthomson@engstromlee.com
 cengstrom@engstromlee.com
 *Appearing pro hac vice

Paul B. Derby, CA Bar No. 211352*
 Hajir Ardebili, CA Bar No. 224624*
 John J. O'Kane IV, CA Bar No. 268632*

SKIERMONT DERBY LLP

633 West Fifth Avenue, Suite 5800
 Los Angeles, CA 90071
 Telephone: 213-788-4500
 pderby@skiermontderby.com
 hardebili@skiermontderby.com
 jokane@skiermontderby.com
 *Appearing pro hac vice

Marie E. Casciari, WSBA No. 58223

DEBOFSKY LAW, LTD.

3101 Western Ave., Suite 350
 Seattle, WA 98121
 Telephone: (206) 333-2696
 mcasciari@debofsky.com

Counsel for Plaintiffs

DLA PIPER LLP (US)

/s/ Anthony Todaro

Anthony Todaro, WSBA No. 30391
 701 Fifth Avenue, Suite 6900
 Seattle, Washington 98104-7029
 Tel: 206.839.4800
 anthony.todaro@us.dlapiper.com

John J. Hamill (admitted *pro hac vice*)
 444 West Lake Street, Suite 900
 Chicago, Illinois 60606-0089
 Tel: 312.368.4000
 john.hamill@us.dlapiper.com

Amanda L. Morgan (admitted *pro hac vice*)
 555 Mission Street, Suite 2400
 San Francisco, California 90405-2933
 Tel: 415.836.2500
 amanda.morgan@us.dlapiper.com

Brian Benjet (admitted *pro hac vice*)
 One Liberty Place
 1650 Market Street, Suite 4900
 Philadelphia, Pennsylvania 19103
 Tel: 215.656.3311
 E-mail: brian.benjet@us.dlapiper.com

Attorneys for Defendant Callan LLC

**GORDON REES SCULLY
MANSUKHANI, LLP**

s/ Sarah N. Turner

Sarah N. Turner WSBA#: 37748
Michael C. Tracy, WSBA #51226
701 Fifth Avenue, Suite 2100
Seattle, WA 98104
Tel: (206) 695-5115
sturner@grsm.com
mtracy@grsm.com

AND

**GROOM LAW GROUP,
CHARTERED**

William J. Delany, admitted *pro hac*
vice
David N. Levine, admitted *pro hac vice*
Shaun A. Gates, admitted *pro hac vice*
1701 Pennsylvania Ave. NW
Washington, DC 20006
Tel: (202) 857-0620
Fax: (202) 659-4503
wdelany@groom.com
dlevine@groom.com
sgates@groom.com

*Counsel for Defendants Carpenters of
Western Washington Board of Trustees,
Gerald Auvil, Noe Castillo, Ken Ervin,
Jeff Foushee, Kurt Hildebrand, Steve
Hoffmann, Martin Holberg, Dan
Hutchins, Ryan Hyke, Andrew
Ledbetter, Ron Montoya, Tim O'Neill,
Jimmy Osborne, Doug Peterson, Rick
Poitras, Danny Robins, Evelyn Shapiro-
O'Connor, Bob Susee, Jeff Thorson,
Doug Tweedy, and Wilf Wainhouse*

ORDER

The Court hereby grants the Parties' Stipulated Motion to Extend Case Schedule and directs the Clerk of the Court to enter a new Case Scheduling Order.

IT IS SO ORDERED on this 29th day of July, 2025.


JOHN H. CHUN
UNITED STATES DISTRICT JUDGE